

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 06-2

SECOND SET OF INFORMATION REQUESTS TO
SOUTHERN UNION COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Southern Union Company (“Southern Union” or “Company”) the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. File the responses as they are completed but no later than **10:00 a.m. on January 27, 2006**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the respondent or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
5. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
6. Please serve one (1) original copy of the responses on Mary Cottrell, Secretary of the Department, and one (1) copy to each party on the latest service list. Also submit five (5) copies of the responses to Jesse S. Reyes, Hearing Officer. Nonproprietary

responses should also be submitted electronically by e-mail attachment to dte.efiling@state.ma.us and to all persons on the service list.

7. Responses for which the Company seeks protective treatment should be marked confidential, along with an attached motion for protective treatment, and submitted to the Hearing Officer. Redacted copies should be filed with the Secretary.

Information Request

- DTE 2-1 Refer to the company's response to DTE 1-14 (Schedule 4.4, Sid Richardson Energy Services, Ltd. and Subsidiaries, Consolidated Financial Statements, December 31, 2004 and 2003). On page 6, in Note (2)(a), it is noted that the financial statements include the assets, liabilities, income, and expenses of Grey Ranch. Please describe the operations of Grey Ranch and its relation to SRES. Please breakout its assets, liabilities, income and expenses for its latest year-end. Finally, indicate if it is part of the SRES acquisition.